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14 *successor in interest to Defendant Twitter, Inc.*

15  
16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

18 United States of America,

19 Plaintiff,

20 vs.

21 Twitter, Inc.,

22 Defendant.  
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Case No. 3:22-cv-3070-TSH

**DECLARATION OF RENATO LEITE  
MONTEIRO IN SUPPORT OF X CORP.'S  
ADMINISTRATIVE MOTION TO SEAL**

The Hon. Thomas S. Hixson

**DECLARATION OF RENATO MONTEIRO**

I, Renato Leite Monteiro, declare as follows:

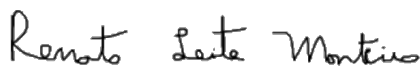
1. I am the Global Head of Privacy, Global Data Protection Officer, and Senior Legal Director for X Corp., successor in interest to Defendant Twitter, Inc. I make this declaration based on personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein. I make this declaration in support of X Corp.'s Administrative Motion to File Under Seal Certain Documents in Support of X Corp.'s Reply In Support of Motion for Protective Order & Relief From Consent Order (the "Administrative Motion").

2. I understand that, by the Administrative Motion, X Corp. seeks to file under seal certain attachments to its Reply in Support of Motion for Protective Order & Relief From Consent Order, including a copy of a Cybersecurity Assessment prepared for X Corp. by the consulting firm FTI Consulting.

3. I am familiar with FTI Consulting's Cybersecurity Assessment by virtue of my role at X Corp. I am aware that it contains information about X Corp.'s privacy and security technology, processes, policies, and procedures that X Corp. keeps confidential in the normal course of business. X Corp. keeps such information confidential for a number of reasons, including in order to (1) prevent bad actors from gaining insight into how the company's systems operate, which could be used to identify potential exploits or penetrations, and (2) prevent competitor businesses from gaining a competitive advantage by learning information about X Corp.'s systems and procedures that X Corp. lacks about its competitors.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: 10/10/2023

  
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Renato Leite Monteiro